



ENVIRON

November 29, 1999

Federal Express

U.S. Environmental Protection Agency
2890 Woodbridge Avenue
Bldg. 209 (MS-211)
Edison, New Jersey 08837
Attention: Cornell-Dubilier Electronics Site On-Scene Coordinator

Chief, New Jersey Superfund Branch
Office of Regional Counsel
United States Environmental Protection Agency
290 Broadway, 17th Floor
New York, New York 10007-1866
Attention: Cornell-Dubilier Electronics Site Attorney

Re: Cornell-Dubilier Electronics Site - Administrative Order on Consent for Removal
Action, Index No. II-CERCLA-99-2006
Progress Report No. 19

Dear Sirs:

As specified in Paragraph 50 of the above-referenced Administrative Order, on behalf of Respondents Cornell Dubilier Electronics, Inc. (CDE) and Dana Corporation (Dana), ENVIRON Corporation (ENVIRON) is submitting this progress report which summarizes activities conducted pursuant to this AOC between November 4 and November 17, 1999.

Completed Activities

During this period, the following activities were completed:

- Delivered the final truckload of excavated soil to the Waste Management GROWS Landfill on November 4, 1999. A copy of this manifest is attached.
- Restoration of excavated areas at Properties W (493 Hamilton Boulevard), AA (346 Hamilton Boulevard) and DD (229 Delmore Avenue), and restoration of the staging area located on the Hamilton Industrial Park property.
- Provided clarification of disposal plans for drummed decontamination wash water and debris to USEPA. The requested information was provided to Eric Wilson of USEPA during a telephone call on November 11, 1999.
- Collected a sample of the topsoil placed on Property X (115 Delmore Avenue). This sample was collected on November 13 and provided to Maser Consulting, Inc. for grain size analysis.

- Distribution of a request for water usage information; this request was sent to all Tier II property owners on November 17, 1999.

Ongoing Activities

During this period, the following activities were initiated and/or are in-progress:

- Resolving minor landscaping changes with the individual property owners.
- Restoration activities at the remaining five Tier II Residential Properties.
- Documentation of the accident on November 1, 1999 involving a truck transporting excavated soil to the GROWS landfill.
- Arrangements for decontamination waste water disposal.
- Preparation of the Final Report.

Two-Week Schedule of Planned Activities

In addition to the ongoing activities, during the next two-week period (November 18 through December 1, 1999) the following activities are planned:

- Identification of restoration activities that must be postponed until the spring 2000 due to weather constraints.

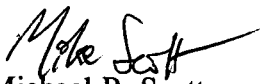
One-Month Schedule of Planned Field Activities

In addition to the ongoing activities, during the next four-week period (November 17 through December 15, 1999) the following activities are planned:

- Completion of decontamination waste water and debris disposal.
- Completion of property restoration activities, with the exception of those items that must be postponed until the spring 2000 due to weather constraints.

Please call Mark Nielsen or me at (609) 452-9000 if you should have any questions regarding this progress report.

Sincerely,



Michael P. Scott
Principal

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cc: R. Sanoff, Esq.
M. Last, Esq.

WASTE MANAGEMENT OF PENNSYLVANIA, INC.
1121 Bordertown Road
Morrisville, PA 19067

(215) 736-6400
(215) 736-6475 Laboratory

Document Refer No. 24773

NON-HAZARDOUS WASTE MANIFEST

1. Generator of Waste (must be filled in by producer) EPA I.D. No. _____
Company Name: (Print or Type) Hamilton Industrial Park PPP Group
Pick-up Address: Spicer & Garibaki Avenues South Plainfield, NJ
Telephone Number: (908) 246-0830 SIC No. 2811
Waste Stream Identification: This manifest represents a non-hazardous waste as per EPA and PA D.E.R. regulations.
Tons: 24 Cubic Yards: _____ Other (Specify): _____
Name of Waste: Non-hazardous Sol
Special Handling Instructions, if any: None

PROFILE/WASTE STREAM I.D. NUMBER: 478737

This is to certify that the above named materials are properly classified, described, packaged, marked, and labeled and are in proper condition for transportation according to applicable state and federal law. The wastes were consigned to the transporter named and certify that the foregoing is true and correct to the best of my knowledge.

Date: 11/1/99 Signature: [Signature]

2. Hauler of Waste (must be filled-in by hauler) EPA I.D. No. _____
COMPANY NAME: Indians Valley Bulk
ADDRESS: Ridge Rd Tylersport PA
Pick-up Date: 11-1-99 Truck No. 9812/T161 Vehicle Lic. No. PA/A3-64336

The above described waste was picked up and hauled by me to the disposal facility named below and was accepted. I certify under penalty of perjury that the foregoing is true and correct.

Signature of authorized agent and title: [Signature] 11-1-99

3. Disposer of Waste (must be filled-in by disposer) CIRCLE ONE:

G.R.O.W.S., INC.
1513 Bordertown Road
Morrisville, PA 19067
Permit #100149

T.R.R.F.
200 Bordertown Road
Tullytown, PA 19007
Permit #101494

(92)

Waste subject to this manifest was delivered by the above hauler to this disposal facility and accepted on 11/1/99 (DISPOSAL DATE)
Signature of authorized agent and title: [Signature]

HAULER

0118373 REMARKS

TONS DUMPED TODAY: 24.78

SIGN

IL

CUSTOMER: 396

CORNELL-DUBIL

HAULER:

TRUCK: 9804

WASTE

ON CONTAIN

PC

MANIFEST: 24773

UNTRAINED SOIL

GROSS: 33420 LB

TARE: 30020 LB

NET: 3400 LB

PCT: 107 VOL

100

53400



DATE: 11/04/1999
TIME: 07:13-08:05

295720